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RICHMOND COUNTY

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February 7, 2020

[REDACTED]
[REDACTED]

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Pursuant to my ongoing obligations, I am making the following disclosure about Lt. Joseph Labella, whom I intend to call as a witness in the above-referenced matter.

On November 9, 2012, Lt. Labella was named as a defendant in a civil action in Kings Supreme Court.

On March 29, 2019, Lt. Labella was found to have failed to investigate and notify his duty captain of an incident. A letter of instruction was issued.

On April 25, 2019, Lt. Labella was found to have failed to notify IAB in a timely manner and was given a letter of instruction.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]